

**IN THE UNITED STATES BANKRUPTCY  
COURT FOR THE SOUTHERN DISTRICT OF  
TEXAS HOUSTON DIVISION**

<b>In re:</b>  <b>Fieldwood Energy III LLC, <i>et al.</i>,</b>  <b>Post-Effective Date Debtors<sup>1</sup>.</b>	§ § § § § §	<b>Case No. 20-33948 (MI)</b>  <b>Chapter 11</b>  <b>Jointly Administered</b>
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**STIPULATION AND AGREED ORDER EXTENDING RESPONSE DATE AND  
RESETTING HEARING DATE ON PLAN ADMINISTRATOR’S OBJECTION TO  
ADMINISTRATIVE PROOFS OF CLAIM FILED BY FREEPORT-MCMORAN OIL &  
GAS LLC AND MCMORAN OIL & GAS LLC;  
[this relates to Dkt. No. 2832]**

This stipulation and agreement (the “**Stipulation**”) is entered into by and among (i) David Dunn, the plan administrator (the “**Plan Administrator**”) appointed pursuant to the Notice of (I) Entry of Order Confirming Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors [Docket No. 2016])<sup>2</sup>; and (ii) Freeport-McMoRan Oil & Gas LLC and McMoRan Oil & Gas LLC (collectively “**McMoRan**”); regarding the Plan Administrator’s Objection to Freeport-

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<sup>1</sup> The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III, LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “Post-Effective Date Subsidiaries”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtor), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

<sup>2</sup> Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to such terms in the Plan.

McMoRan Oil & Gas LLC and McMoRan Oil & Gas LLC's Administrative Expenses Proofs of Claim [Docket No. 2832] (the "**Objection**"). The Parties hereby stipulate and agree as follows:

**WHEREAS**, McMoRan filed certain claims as identified in the Claims Objection.

**WHEREAS**, the Plan Administrator filed his Objection on August 15, 2023, which included a response date of September 14, 2023, and an initial pre-trial hearing on October 2, 2023, at 10:30 a.m.

**WHEREAS**, the Parties have agreed to enter into and jointly submit this Stipulation extending McMoRan's response date and resetting the date of the initial pre-trial hearing in connection with the Objection.

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:**

1. McMoRan's deadline to respond to the Objection is extended to and through October 20, 2023, subject to further extensions based on the Parties' agreement.
2. The initial pre-trial hearing on the Objection is reset to November 6, 2023 at 10:00 a.m., or such later time as the Court directs.

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first written below.

**IT IS SO ORDERED**

Dated:

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UNITED STATES BANKRUPTCY JUDGE  
MARVIN ISGUR

/s/ Brad C. Knapp

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**ATTORNEYS FOR MCMORAN**

-and-

/s/ Aaron Guerrero (by permission)

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**ATTORNEYS FOR DAVID DUNN, THE PLAN**

**ADMINISTRATOR FOR THE POST-EFFECTIVE DATE DEBTORS**

**CERTIFICATE OF SERVICE**

I hereby caused a true and correct copy of the foregoing *Stipulation* to be served on September 12, 2023 upon all parties receiving electronic notification in this case via the Court's Electronic Case Filing system.

/s/ Brad C. Knapp

Brad C. Knapp